



JOHN ASHCROFT  
Governor

FREDERICK A. BRUNNER  
Director

Division of Energy  
Division of Environmental Quality  
Division of Geology and Land Survey  
Division of Management Services  
Division of Parks, Recreation,  
and Historic Preservation

STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

Springfield Regional Office  
1155 East Cherokee Street  
Springfield, MO 65807  
417-883-4033

HzW/Greene County  
Dayco Products, Inc  
LOW 87-SP.023

October 19, 1987

RECEIVED  
NOV 6 1987

WASTE MANAGEMENT  
PROGRAM

Mr. Howard J. Jensen, Consultant  
Dayco Products, Incorporated  
P.O. Box 3258  
Springfield, MO 65808

Dear Mr. Jensen:

Enclosed please find a copy of the inspection report completed pursuant to the Missouri Hazardous Waste Management Law & Regulations which I believe to be self-explanatory. Dayco Products, Incorporated must demonstrate compliance with each of the recommendations in the attached inspection report. To demonstrate compliance please submit at least the following documents:

- (1) Written certification that serially increasing shipment numbers will be listed on all future manifests as required by 10 CSR 25-5.262(2)(B)2.A;
- (2) Written certification that the transporter's Missouri identification number will be listed on all future manifests as required by 10 CSR 25-5.262(2)(B)2.B;
- (3) A reasonable written schedule for the construction of a drum storage area containment system as required by 10 CSR 25-5.262(2)(C)2.B;



R00126794  
RCRA RECORDS CENTER

Mr. Howard J. Jensen  
October 19, 1987  
Page Two

- (4) Written certification that an operating record will be maintained for future resource recovery facility operations as required by 10 CSR 25-9.010(1)(D)4.

Please submit the above requested documentation by November 19, 1987, to the Springfield Regional Office.

If you have any questions, please advise.

Sincerely,

SPRINGFIELD REGIONAL OFFICE

John R. Nixon, P.E.  
Administrator

JRN:CLK:GLR:jh

Enclosure

cc: Waste Management Program  
Mr. Jerome D. Rader

## HAZARDOUS WASTE COMPLIANCE INSPECTION REPORT

DAYCO PRODUCTS, INCORPORATED  
P.O. Box 3258, 2601 W. Battlefield  
Springfield, MO 65808  
417/881-7440

MDNR #07639  
EPA ID #MOD042860023  
RR 235

### INTRODUCTION:

On October 7, 1987, Gale L. Roberts, Missouri Department of Natural Resources/ Division of Environmental Quality/Springfield Regional Office conducted a hazardous waste compliance inspection at the Dayco Products, Incorporated, Springfield manufacturing plant and technical center in Springfield, Greene County, Missouri. Mr. Howard J. Jensen, a former employee and now a consultant for Dayco, was present during the inspection.

The manufacturing plant blends natural and synthetic rubbers with carbon black, sulfur, and other chemicals. The rubber mixture is calendered into sheets which are manufactured into power transmission belting (V-belts). The technical center does testing and research on V-belts and hydraulic hoses.

The only 40 CFR 261 hazardous waste produced is 91 kg/month of F003 and F005 waste solvent mixture which includes acetone, ethyl acetate, and toluene. These waste solvents are from laboratory and research operations. The waste solvents are hand carried in beakers to one of two satellite accumulation areas and poured into a 55-gallon drum. During the inspection, there was one partially filled 55-gallon drum in each satellite accumulation area and these had beginning accumulation dates of August 25, 1987, and July 30, 1987. In the past, these solvents were poured into the 10,000-gallon No. 6 fuel oil underground storage tank which is used to fire the steam boilers during periods when natural gas is not used. However, since June 1987, all waste solvents and waste oils have been shipped to Diaz Refinery, Incorporated in Diaz, Arkansas.

Waste oils are also produced in the Springfield plant at a rate of 3030 kg/month. These waste oils include dust stop oil from the blending/calendering operation, process oil, hydraulic oil, and oil dry from cleanups. These waste oils were previously poured into the No. 6 fuel oil storage tank along with the waste solvents and burned in the boilers, but, as noted above, all waste oils have been shipped to Diaz Refinery, Incorporated since June 1987.

### UNSATISFACTORY FEATURES:

- (1) The manifests did not list serially increasing shipment numbers as required by 10 CSR 25-5.262(2)(B)2.A;
- (2) The manifests did not list the Missouri transporter identification number as required by 10 CSR 25-5.262(2)(B)2.B;
- (3) The drum storage area did have a containment system as required in 10 CSR 25-5.262(2)(C)2.B;

- (4) An operating record was not maintained for the resource recovery facility as required by 10 CSR 25-9.010(1)(D)4.

COMMENTS:

Missouri generators are required to record more information on manifests than is required by the federal regulations. This additional information includes serially increasing consecutive shipment numbers and the transporter's Missouri identification number. No consecutive shipment numbers were shown on the manifests. The Diaz Refinery transporter's identification number was shown as HZ(PC703) on the (Arkansas) manifests while our records show the Diaz Refinery Missouri transporter's identification number as H01263.

No drums of waste solvent were stored in the outside drum storage area at the time of the inspection, but five drums of waste oil were in storage. The drum storage area did not have a containment system. The regulations require that the containment system include an impervious base sloped to drain leaks or precipitation with a capacity equal to 10% of the containerized waste volume or the volume of the largest container (whichever is larger). The containment system must be designed to prevent runoff of storm water.

The resource recovery facility has not been used since June 1987. The facilities for transferring waste oil or solvent into the underground No. 6 fuel oil tank did not appear adequate since 55-gallon drums of waste were hand poured into an eight-inch diameter funnel. There was no spill collection facility around the transfer funnel. Improved facilities are recommended.

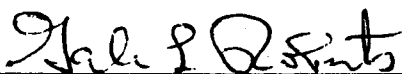
No operating record was maintained for the resource recovery facility. This operating record must include the location and quantity of each hazardous waste within the facility and the method and date of the disposal of the hazardous waste. For this facility, records of the amount of waste oil and solvent produced, the amount blended with fuel oil, and the amount of fuel oil/waste oil/solvent mixture burned should be kept including the concentration of waste oil/solvent in the fuel tank and the dates of production, blending, and burning.


RECOMMENDATIONS:

- (1) List serially increasing shipment numbers on all hazardous waste manifests;
- (2) List the transporter's Missouri identification number on all manifests;
- (3) Install a drum storage containment system;
- (4) Keep a resource recovery operating record.

SUBMITTED BY:

APPROVED BY:

  
\_\_\_\_\_  
Gale L. Roberts, P.E.  
Environmental Engineer

  
\_\_\_\_\_  
Charles L. Kroeger  
Unit Chief

Name of Facility: Dayco Products Inc Springfield PlantDate: 10-07-87Address: PO Box 3258 Springfield MO 658082601 W. Battlefield Springfield MO 65807Facility Representative: Howard J. JensenMissouri I.D. 1 07639EPA I.D. 1 MOD042860023Title: ConsultantPhone Number 417-881-7440Is this facility a TSD? NOTransporter? NO

Provide a brief description of the manufacturing process.

Manufacturing plant blends natural and synthetic rubbers with carbon black, sulfur, and other chemicals, calenders this mixture into sheets, then manufactures power transmission belting (V-Belts). Technical center does testing and research on V-Belts and hydraulic hoses.

List the hazardous wastes generated:

|       | Waste  | Amount/month     | Kilogram/month  | I.D. #      | Disposition              |
|-------|--|------------------|-----------------|-------------|--------------------------|
| 1.    | <u>Waste Solvents (acetone, ethyl acetate)</u> | <u>200 lb/mo</u> | <u>91 Kg/mo</u> | <u>E003</u> | <u>Diaz Refining Inc</u> |
| 2.    |  |                  |                 |             |                          |
| 3.    |  |                  |                 |             |                          |
| 4.    |  |                  |                 |             |                          |
| 5.    |  |                  |                 |             |                          |
| 6.    |  |                  |                 |             |                          |
| Total |  |                  |                 |             |                          |

RECEIVED  
NOV 6 1987

Annual generation rate for time period of July 1 through June 30:

WASTE MANAGEMENT PROGRAM

Total amount of waste generated on an annual basis. 1.092 kkg.Amount of waste land disposed on annual basis. 0 kkg.Amount of waste stored under permit conditions on annual basis. 0 kkg.Amount of waste managed by all other methods on annual basis. 1.092 kkg.Is the category tax (Section 260.478 RSMo.) applicable? yes noIs the tax being paid? yes noIs the \$25 land disposal tax (Section 260.475 RSMo.) applicable? yes noIs it being paid? yes noIs the \$1.00 generator fee applicable? yes noIs it being paid? yes noIf the total amount of hazardous waste generated is less than 100 kg/month, is over 100 kg ever accumulated? Yes X No noIf the total amount of hazardous waste generated is less than 1000 kg/month, is over 1000 kg ever accumulated? Yes no No XIf 1000 kg is never accumulated, is hazardous waste disposed of within 1 year? Yes X No noHas the generator determined if waste is hazardous? Yes X No no

- A. Manifests and Recordkeeping 10 CSR 25-5.262(1) and 5.262(2) and (D)
- 1. Generator's MO and EPA I.D. Numbers ..... (✓)
  - 2. Serially increasing shipment number ..... (✓)
  - 3. MO waste I.D. # correct..... (✓) **DNA**
  - 4. Generator's name, address, phone #..... (✓)
  - 5. All transporters' names, phone #'s, MO and EPA I.D. #'s..... (✓)
  - 6. Designated facility name, address, phone # and EPA I.D. #..... (✓)
  - 7. Proper ECT Shipping Name, Hazard Class and I.D. #..... (✓)
  - 8. Containers, Quantity and Unit Wt/Vol being shipped properly designated..... (✓)
  - 9. Proper certification..... (✓)
  - 10. Manifest properly signed and dated..... (✓)
  - 11. No more than 10 days time between generator and facility signatures..... (✓)
  - 12. Manifests returned within 35 days..... (✓)
  - 13. If not, exception generator report submitted within 45 days..... **DNA** ( )
  - 14. Completed manifests submitted to DNR quarterly..... (✓)
  - 15. Summary Manifests Report submitted to DNR quarterly..... (✓)
  - 16. Biennial Report..... **Not yet** ( )
- B. PRETRANSPORT, CONTAINERIZATION AND LABELING 10 CSR 25-5.262(1) and 5.262(2)(C)1
- 17. Waste stored in proper DOT containers..... (✓)
  - 18. Containers/Tanks labeled "Hazardous Waste" and labeled per proper DOT requirements during storage..... (✓)
  - 19. Placards available for use by transporters..... (✓)
- C. STORAGE STANDARDS 10 CSR 25-5.262(1) and 5.262(2)(C)2
- 20. Facility inspected and maintained..... (✓)
  - 21. Ignitable and reactive wastes properly handled..... (✓)
  - 22. Date of accumulation marked..... (✓)
  - 23. Storage less than 90 days (if applicable)..... (✓)
  - 24. Satellite Accumulation requirements met (if applicable)..... ( )
    - a. Stored in satellite areas less than 1 year..... (✓)
    - b. Container marked identifying contents and beginning date..... (✓)
    - c. Containers kept closed / compatible / good condition..... (✓)
    - d. Quantities accumulated not exceeding 55 gal. (1 quart acutely hz waste)..... (✓)
- D. CONTAINER STORAGE 10 CSR 25-5.262(1) and 5.262(2)(C)2
- 25. Containers in good condition..... (✓)
  - 26. Containers kept closed in storage..... (✓)
  - 27. Containers storing incompatible waste separated or protected from each other..... **DNA** ( )
  - 28. Containers of ignitable or reactive waste stored > 50 feet from property line..... (✓)
  - 29. Containers stored within a containment system (if applicable) meeting criteria of 10 CSR 25-5.262(1)(C)2.E..... ( )
- E. STORAGE TANKS 10 CSR 25-5.262(1) and 5.262(1)(C)2.F. **No storage tanks except NOG fuel oil tank to which waste oil is added**
- 30. Tanks in good condition..... ( )
  - 31. Procedure for assessing condition of tanks..... ( )
  - 32. Above ground tanks - adequate spill confinement systems / inspected weekly... ( )
  - 33. Underground tanks that cannot be entered have adequate leak detection systems..... ( )
  - 34. Leak detection procedure and schedule developed and used..... ( )
  - 35. Open tanks have \_\_\_\_\_ ft. freeboard..... ( )
  - 36. Incompatible wastes stored safely and properly..... ( )
  - 37. Volatiles are not placed in open tanks..... ( )
  - 38. Ignitable or reactive wastes stored safely and properly..... ( )

- 39. Ignitable or reactive \_\_\_\_\_ in covered tanks stored in accordance with HMTA's buffer zone requirements..... ( )
- 40. Controls to prevent overfilling..... ( )
- 41. Daily inspection of overfilling control equipment..... ( )
- 42. Daily inspection of freeboard in uncovered tanks..... ( )
- 43. Covered in contingency plan..... ( )

HAZARDOUS WASTE STORAGE TANKS

| WASTE CONTAINED | VOLUME OF TANK |
|-----------------|----------------|
|                 |                |
|                 |                |
|                 |                |
|                 |                |

For storage or generation in any month of over 1000 kg, complete the following additional three sections: **DNA**

- F. PERSONNEL TRAINING 10 CSR 25-5.262(1)
- 44. Completed classroom or on-the-job training..... ( )
  - 45. Job title, description, and name of person filling position..... ( )
  - 46. Written record of the type and amount of training given..... ( )
  - 47. Documentation confirming that training has been given..... ( )

- G. PREPAREDNESS AND PREVENTION 10 CSR 25-5.262(1) and 5.262(2)(C)2.H.
- 48. Internal communication or alarm system..... ( )
  - 49. Device in the hazardous waste operation area capable of summoning emergency assistance..... ( )
  - 50. Fire control, spill control, and decontamination equipment available..... ( )
  - 51. Adequate water supply for fire control equipment..... ( )
  - 52. Adequate and proper safety equipment available..... ( )
  - 53. Adequate aisle space..... ( )
  - 54. Arrangements with local emergency agencies..... ( )

- H. CONTINGENCY PLAN AND EMERGENCY PROCEDURES 10 CSR 25-5.262(1)
- 54. Contingency Plan..... ( )
  - 55. Detailed description of procedures that personnel must implement in response to fires, explosions, or release of hazardous waste..... ( )
  - 56. Describe formal arrangements with emergency agencies..... ( )
  - 57. Names, addresses, and phone numbers (home & office) of emergency coordinators..... ( )
  - 58. Emergency equipment including its description and location..... ( )
  - 59. Evacuation plan if applicable..... ( )

- I. WASTE OIL 10 CSR 25-11.010
- 60. Waste oil properly handled..... ( )

COMMENTS: \_\_\_\_\_

Please mark boxes as shown (✓) In compliance

In violation  
Inspector's Signature John J. Roberts  
Title Environmental Engineer  
Office Springfield

# RESOURCE RECOVERY FACILITY CHECKLIST

Name of Facility: Dayco Products Inc Springfield Plant

Date: 10-07-87

Address: PO Box 3258 Springfield MO 65808

2601 W. Battlefield Springfield MO 65807

RR #: 235 Mo. I.D. #: 07639 EPA I.D. # <sup>MOD</sup>: 042860023 Facility Class.: U

Facility Representative: Howard J. Jensen Title: Consultant

Is this facility a generator? yes TSD? no Transporter? no

Is a copy of the certification maintained at the facility? Yes X No       

Is this facility meeting the conditions of their certification? Yes X No       

If no, please elaborate.       

List the wastes that are recovered:

1. Waste solvents

2. Waste oil

3.       

4.       

Are wastes accepted from off-site sources? Yes        No X

If yes, please complete Section A. If no, proceed to Section B.

## A. MANIFESTS 10 CFR 25-9.010(1)(D)2. DNA

1. Shipments from off-site sources manifested.....( )
2. Manifests properly completed by the generator.....( )
3. Has the operator properly dated and signed the manifest.....( )
4. Generator's manifest returned within 30 days.....( )
5. Does the facility maintain their copy of the manifest for 3 years.....( )
6. Manifest discrepancies noted and actions taken to resolve the discrepancies..( )
7. Time between the generator and facility 10 days or less.....( )

## B. BOOKKEEPING AND REPORTING 10 CFR 25-9.010(1)(D)2.

8. Facility submitting quarterly report form DNR-107-1.....☒
9. Non-manifested shipments properly reported.....DNA.....( )
10. Operating Record.....☒
11. Facility constructed and operated according to plans.....☒
12. If not, have modifications been approved.....DNA.....( )

COMMENTS: The RR is currently not used and all oil and solvent are being shipped to Diaz Refinery Inc

15. Underground tanks and impoundments constructed with a system for detecting leaks.....☒
16. Describe storage of waste and product at the facility, condition of containers, amounts, labeling, segregation, spill prevention, housekeeping, term of storage, etc. oil & solvent collected in 55 gallon drums and then poured by hand into a 10000 gallon underground No. 6 fuel oil storage tank

## E. ADDITIONAL OPERATING STANDARDS FOR R1 AND R2 10 CFR 25-9.010(E) DNA

17. Operator following approved quality control plan.....( )
18. Daily log of wastes received.....( )
19. Daily log of inspection and maintenance.....( )
20. Facility plan to continue operation for the next 6 months.....( )
21. Approved waste analysis being followed.....( )
22. Records of analysis kept on file.....( )

Please describe items such as parameters of analysis, % of shipment analyzed, results of analysis, etc.       

## D. STORAGE 10 CFR 25-9.010(1)(D)3., 4. and 5.

13. Storage in secure enclosure.....☒
14. Storage with proper waste confinement.....☒

Please mark boxes as shown

☒ In compliance

☐ In violation

Inspector's Signature Mark L Roberts

Title Environmental Engineer

Office Springfield